

**GEORGIA PESTANA**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**MARTHA NIMMER**  
*Special Assistant Corporation Counsel*  
Cell: (917) 499-8632

June 10, 2021

**VIA ECF**

Hon. Paul A. Crotty  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *L.H. obo O.H. v. N.Y.C. Dep't of Education*, 21-cv-0923 (PAC)(RWL)

Dear Judge Crotty:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 6-week extension of Defendant's time to respond to the complaint, from June 11, 2021 to July 23, 2021. I am also requesting that the June 21, 2021 conference be adjourned to one of the following dates: July 28, July 30 or August 2, 2021. Due to a cyberattack on the Law Department, this request was not made earlier, with sincere apologies to the Court.

Plaintiff consents to this extension of the time to answer as well as to the adjournment of the conference. This is the second request for an extension of the time to answer. The first request was made on April 2, 2021 and granted by Your Honor on April 5, 2021. The requested 6-week extension would provide the undersigned with time to receive and review the requested administrative billing records and request settlement authority from the Comptroller's Office. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

Accordingly, Defendant respectfully requests that its time to respond to the complaint be extended to July 23, 2021, and the June 21, 2021 conference be adjourned to July 28, July 30 or

August 2, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

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Martha Nimmer

Special Assistant Corporation Counsel

cc: Irina Roller, Esq (via ECF)

6/11/2021

The six week extension to July 23, 2021 is granted. The June 21 conference is adjourned to July 28, 2021 at 11:30 AM in courtroom 14-C. SO ORDERED.

